

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

\_\_\_\_\_  
ACCESS 4 ALL, INC., a Not-for-Profit  
Corporation, and FELIX ESPOSITO, Individually

*Plaintiffs,*

v.

\_\_\_\_\_  
MASSACHUSETTS MUTUAL LIFE  
INSURANCE CO., a Massachusetts corporation,

*Defendant.*

NO. 1: 04-12240-GAO

**DEFENDANT'S LOCAL RULE 16.4 CERTIFICATION**

Sean M. Seely, Litigation Attorney for defendant Massachusetts Mutual Life Insurance Co., and the undersigned counsel for said defendant hereby certify that they have conferred with a view to establishing a budget for the cost of conducting the full course – and various alternate courses – for the litigation, and to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Dated: February 18, 2005

/s/: Sean M. Seely  
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/s/: Minh N. Vu  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of February, 2005, I served a copy of the foregoing  
Defendant's Certification by first class mail to:

O. Oliver Wragg, Esq.  
Lawrence Fuller, Esq.  
Fuller, Fuller & Associates, P.A.  
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/s/: Minh N. Vu  
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